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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF ALEXANDER
FRAWLEY IN OPPOSITION TO
GOOGLE'S MOTION *IN LIMINE*
NUMBER 1: RE: SANCTIONS**

Judge: Hon. Yvonne Gonzalez Rogers

DECLARATION OF ALEXANDER FRAWLEY

I, Alexander Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York and admitted *pro hac vice* for this case. Dkt. 97. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this declaration in opposition to Google's Motion *In Limine* Number 1 Re: Sanctions.

3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the deposition of Plaintiffs' expert Jonathan Hochman, taken by Google's counsel on July 21, 2022.

4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the deposition of Plaintiffs' expert Jonathan Hochman, taken by Google's counsel on October 10, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of October, 2023, at New York, New York.

/s/ Alexander Frawley